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1	LAW OFFICES OF MARK S. NELSON MARK S. NELSON, ESQ., CSB #131218 ANGELICA J. ANGUIANO, ESQ., CSB #289414 DEREK L. CASEY, ESQ., CSB #313309 215 McHenry Avenue Modesto, CA 95354		
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4	Telephone: (209) 529-6055 Facsimile: (209) 529-6061		
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6	Attorney for Debtor(s), Walsh, John and Brianne		
7	UNITED STATES BANKRUPTCY COURT		
8	EASTERN DISTRICT OF CALIFORNIA		
9.	, G N 17 00001		
10	In re: ) Case No.: 17-90001		
11	JOHN ALBRO WALSH III  Chapter 13 Proceeding  D.C. No.: MSN-002		
12	) B.C. No.: WISIN-002		
13	BRIANNE ELIZABETH WALSH )		
14	Debtor(s).		
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17	EX PARTE MOTION TO REOPEN CHAPTER 13 BANKRUPTCY CASE TO FILE 11 U.S.C.		
18	§1328 CERTIFICATE		
19	Debtors, John and Brianne Walsh, by and through their attorney of record, Mark S. Nelson,		
20	hereby moves the Court for an Order Ex Parte reopening Debtors' bankruptcy case to file their 11		
21	U.S.C. §1328 Certificate.		
22	The Ex Parte Motion is premised on the following:		
23	1. Debtors' filed their Voluntary Chapter 13 Bankruptcy Petition on January 3, 2017.		
24	2. Debtors made all payments that came due pursuant to their Chapter 13 Plan.		
25	3. On September 18, 2019, the Chapter 13 Trustee filed the Notice to Debtor of Complete		
26	Plan Payments and of Obligation to File Documents.		
27	4. Due to an oversight by Debtors' attorney's office, Debtors' 11 U.S.C. §1328 Certificat		
28	(Form EDC 3-190) was not timely filed with the Court.		

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- 5. On January 28, 2020, the Court entered an Order to Close Chapter 13 Case Without Discharge. It was at this time that it was discovered the unintentional error that Debtors' 11 U.S.C. \$1328 Certificate (Form EDC 3-190) was not filed with the Court.
- 6. Debtors now move the Court for an Order to Reopen their case to file the required Certificate, pursuant to 11 U.S.C. §350(b) which provides that "[a] case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause."
- 7. Debtors also request that the Court enter their Discharge once the required 11 U.S.C. §1328 Certificate (Form EDC 3-190) is filed with the Court.

Wherefore, having fully set forth their Motion to Reopen Case, Debtors pray that the Court inquire into the allegations hereof;

The case be reopened to allow for the filing of Debtors' 11 U.S.C. §1328 Certificate (Form EDC 3-190); and

Debtors, John and Brianne Walsh, case be closed with entry of a Chapter 13 Discharge; and as such other and further relief as the Court deems necessary and proper.

Law Offices of Mark S. Nelson

Dated: January 30, 2020

/S/ MARK S. NELSON MARK S. NELSON, ESQ. Attorney for Debtors.